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Attorneys for Pirouz Sedaghaty

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. CR 05-60008-02 HO

Plaintiff,

v.

DEFENDANT'S MOTION
TO MODIFY COURT'S ORDER
OF MAY 16, 2008 AND MOTION FOR
PRELIMINARY PROTECTIVE ORDER

PIROUZ SEDAGHATY,

Defendant.

Defendant, by his attorneys, Lawrence Matasar and Steven T. Wax, hereby moves to modify the Court's May 16, 2008 Order prohibiting communication within the defense team, and further moves for a preliminary protective order pursuant to Fed. R. Crim. P. 16(d)(1), concerning classified information until the defendant has filed a notice under Section 5 of the CIPA.

The requested preliminary protective order would: (1) prohibit discussion among defense counsel or any members of the defense team, including the defendant,

of the contents of the sealed document in the custody of the court security specialist, unless the defendant has already viewed the contents of the document; (2) prohibit discussion among defense counsel or any members of the defense team, including the defendant, of the contents of the sealed document in all locations except for an Oregon location to be chosen by the Court Security Officer; and (3) prohibit defense counsel and any members of the defense team, including the defendant, from preparing any documents discussing the contents of the sealed document on all computers and other devices except for computers furnished by the Court Security Officer at an Oregon location to be chosen by the Court Security Officer

DATED this 16th day of June, 2008.

Respectfully submitted,

/s/ Lawrence Matasar
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Defendant's Motion to Modify Court's Order of May 16, 2008 and Motion for Preliminary Protective Order on Assistant United States Attorney, Chris Cardani on June 16, 2008, via electronic case filing.

/s/ Lawrence Matasar
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